

EXHIBIT A

Commonwealth of Massachusetts

MIDDLESEX, SS.

TRIAL COURT OF THE COMMONWEALTH
SUPERIOR COURT DEPARTMENT
CIVIL DOCKET NO. 21-965James Torino, PLAINTIFF(S),v. Pay Pal, DEFENDANT(S)

SUMMONS

THIS SUMMONS IS DIRECTED TO PAY PAL (Defendant's name)

You are being sued. The Plaintiff(s) named above has started a lawsuit against you. A copy of the Plaintiff's Complaint filed against you is attached to this summons and the original complaint has been filed in the Middlesex Superior Court. **YOU MUST ACT PROMPTLY TO PROTECT YOUR RIGHTS.**

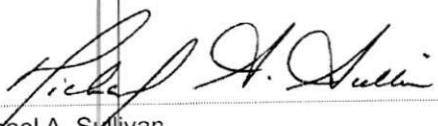
1. **You must respond to this lawsuit in writing within 20 days.** If you do not respond, the court may decide the case against you and award the Plaintiff everything asked for in the complaint. You will also lose the opportunity to tell your side of the story. You must respond to this lawsuit in writing even if you expect to resolve this matter with the Plaintiff. **If you need more time to respond, you may request an extension of time in writing from the Court.**
2. **How to Respond.** To respond to this lawsuit, you must file a written response with the court **and** mail a copy to the Plaintiff's Attorney (or the Plaintiff, if unrepresented). You can do this by:
 - a. Filing your **signed original** response with the Clerk's Office for Civil Business, Middlesex Superior Court, 370 Jackson Street (address), by mail or in person, **AND**
 - b. Delivering or mailing a **copy** of your response to the Plaintiff's Attorney/Plaintiff at the following address: 8 Albert Street Woburn, MA 01801.
3. **What to include in your response.** An "Answer" is one type of response to a Complaint. Your Answer must state whether you agree or disagree with the fact(s) alleged in each paragraph of the Complaint. Some defenses, called affirmative defenses, must be stated in your Answer or you may lose your right to use them in court. If you have any claims against the Plaintiff (referred to as **counterclaims**) that are based on the same facts or transaction described in the Complaint, then you must include those claims in your Answer. Otherwise, you may lose your right to sue the Plaintiff about anything related to this lawsuit. If you want to have your case heard by a jury, you must **specifically** request a jury trial in your Answer or in a written demand for a jury trial that you must send to the other side and file with the court no more than 10 days after sending your Answer. You can also respond to a Complaint by filing a "Motion to Dismiss," if you believe that the complaint is legally invalid or legally insufficient. A Motion to Dismiss must be based on one of the legal deficiencies or reasons listed under **Mass. R. Civ. P. 12**. If you are filing a Motion to Dismiss, you must also comply with the filing procedures for "Civil Motions" described in the rules of the Court in which the complaint was filed, available at www.mass.gov/courts/case-legal-res/rules-of-court.

370 Jackson Street
Woburn, MA 01801

Legal Assistance. You may wish to get legal help from a lawyer. If you cannot get legal help, some basic information for people who represent themselves is available at www.mass.gov/courts/selfhelp.

Required information on all filings: The "civil docket number" appearing at the top of this notice is the case number assigned to this case and must appear on the front of your Answer or Motion to Dismiss. You should refer to yourself as the "Defendant."

Witness Hon. Judith Fabricant, Chief Justice on May 4th, 2021.


 Michael A. Sullivan
 Clerk-Magistrate

Note: The number assigned to the Complaint by the Clerk-Magistrate at the beginning of the lawsuit should be indicated on the summons before it is served on the Defendant.

PROOF OF SERVICE OF PROCESS

I hereby certify that on _____, 20____, I served a copy of this summons, together with a copy of the complaint in this action, on the defendant named in this summons, in the following manner (See Mass. R. Civ. P. 4(d)(1-5)):

Dated: _____, 20____

Signature: _____

N.B. TO PROCESS SERVER:

PLEASE ENTER THE DATE THAT YOU MADE SERVICE ON THE DEFENDANT IN THIS BOX - BOTH ON THE ORIGINAL SUMMONS AND ON THE COPY OF THE SUMMONS SERVED ON THE DEFENDANT.

, 20____

COMMONWEALTH OF MASSACHUSETTS

DOCKET NO. 21-965James Torino
PLAINTIFF(S)

VS.

COMPLAINT

PAYPAL
DEFENDANT(S)FILED
IN THE OFFICE OF THE
CLERK OF COURTS
FOR THE COUNTY OF MIDDLESEX

APR 30 2021

Philip J. Chisholm
CLERKPARTIES

- 1) Plaintiff(s) reside at 8 Albert Street, Woburn
in the County of Middlesex
- 2) Defendant(s) reside at 2211 North First Street SAN Jose
California, 95131
in the County of Santa Clara, CA.

FACTS

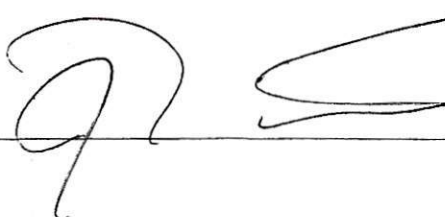
3)

PAYPAL froze my business
Account for no reason. I could
not get access to my money & Intro
I was emailed that I could NOT
do business with them anymore.
I ended up closing my bank Account
because of it. It's Contributing^{to} Emotional
Distress. I am looking to seek Punitive Damage.


DATED:

4/27/21

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

A handwritten signature in black ink, consisting of a large, stylized 'Q' followed by a horizontal line and a small flourish.

Plaintiff(s)

CIVIL ACTION COVER SHEET		DOCKET NUMBER 21-965	Trial Court of Massachusetts The Superior Court		
PLAINTIFF(S): <u>James To Rino</u>		COUNTY			
ADDRESS: <u>8 Albert Street</u> <u>Woburn, Ma. 01801</u>		2		DEFENDANT(S): <u>PAYPAL</u>	
ATTORNEY:		ADDRESS: <u>2211 North First</u> <u>Street San Jose, California</u> <u>95131</u>			
BBO:					

TYPE OF ACTION AND TRACK DESIGNATION (see reverse side)

CODE NO. <u>BE1</u>	TYPE OF ACTION (specify) <u>Business tort</u>	TRACK <u>A</u>	HAS A JURY CLAIM BEEN MADE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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*If "Other" please describe: _____

STATEMENT OF DAMAGES PURSUANT TO G.L. c. 212, § 3A

The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff counsel relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.

TORT CLAIMS
(attach additional sheets as necessary)

A. Documented medical expenses to date:	FILED IN THE OFFICE OF THE CLERK OF COURTS FOR THE COUNTY OF MIDDLESEX APR 30 2021 <i>[Signature]</i> CLERK	
1. Total hospital expenses		\$ <u>0</u>
2. Total doctor expenses		\$ <u>0</u>
3. Total chiropractic expenses		\$ <u>0</u>
4. Total physical therapy expenses		\$ <u>0</u>
5. Total other expenses (describe below)		\$ <u>0</u>
	Subtotal (A):	\$ <u>0</u>
B. Documented lost wages and compensation to date		\$ <u>0</u>
C. Documented property damages to dated		\$ <u>0</u>
D. Reasonably anticipated future medical and hospital expenses		\$ <u>25,000</u>
E. Reasonably anticipated lost wages		\$ <u>600,000</u>
F. Other documented items of damages (describe below)		\$ <u>5,000,000</u>

G. Briefly describe plaintiff's injury, including the nature and extent of injury:
Emotional Distress - Life long

TOTAL (A-F): \$ 5,625,000

CONTRACT CLAIMS
(attach additional sheets as necessary)

Provide a detailed description of claims(s): _____

TOTAL: \$ 5,625,000

Signature of Attorney/Pro Se Plaintiff: X [Signature] Date: 4/27/21

RELATED ACTIONS: Please provide the case number, case name, and county of any related actions pending in the Superior Court.

CERTIFICATION PURSUANT TO SJC RULE 1:18

I hereby certify that I have complied with requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.

Signature of Attorney of Record: X _____ Date: _____

Tort claims

Total medical expenses-

Future medical expenses estimated around- \$25,000 for continued therapy.

Lost wages to date-

The business bank account got closed. I estimate my lost wages at \$12,000 a year.

Anticipated lost wages-

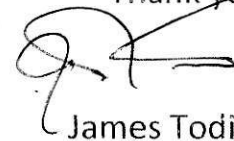
I had the potential to make \$12,000 a year with that business X 50 years = \$600,000

The extent of injury-

The stress of my account freezing my money ~~caused me~~ ^{is contributing} to have emotional distress.

Estimated Punitive Damages- \$5,000,000.

Thank you,

 4/27/21
James Todino



Mr. James Todino
8 Albert St., Apt. 1
Woburn, MA 01801-2177



7020 3160 0002 2334 3613

PAY PAL

2211 North First Street

San. Jose, California, Customer
95131 service

SJC

MAY 24 2021

SJC

9513192021 CO19



1000



U.S. POSTAGE
WOBURN, MA
01801
MAY 18 2021
AMOUNT \$4.60

\$4.60
R2305M1 4622378

OMA

MAY 26 2021

OMA

